

ESTTA Tracking number: **ESTTA593614**

Filing date: **03/20/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	91198614
Applicant	Defendant Ooh La La! Jewelry and Accessories, Inc.
Other Party	Plaintiff Traci Macaro
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 04/18/2014. Ooh La La! Jewelry and Accessories, Inc. requests that such date be extended for 60 days, or until 06/17/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	05/18/2014
Discovery Closes :	06/17/2014
Plaintiff's Pretrial Disclosures :	08/01/2014
Plaintiff's 30-day Trial Period Ends :	09/15/2014
Defendant's Pretrial Disclosures :	09/30/2014
Defendant's 30-day Trial Period Ends :	11/14/2014
Plaintiff's Rebuttal Disclosures :	11/29/2014
Plaintiff's 15-day Rebuttal Period Ends :	12/29/2014

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *This Request for Extension applies to all consolidated proceedings: Opposition Nos. 91198614, 91198615, 91198616 and Cancellation Nos. 92054700 and 92054821. On March 19, 2014, the Applicant filed a Motion for Extension of Deadlines. Subsequently, counsel for the Opposer indicated that he consents to the requested relief. The parties are currently engaged in settlement negotiations. The parties have prepared a draft settlement agreement, proposed revisions to which have been exchanged a number of times between the parties. The parties are close to agreement on the major terms of the settlement but continue to negotiate as to specific language to be used in the agreement.*

Ooh La La! Jewelry and Accessories, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Ooh La La! Jewelry and Accessories, Inc. has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,

/Dale L. Friedman/

Dale L. Friedman

dfriedman@conroysimberg.com, dgailey@conroysimberg.com

ttabmail@whitelawfirm.com, dburkholder@balch.com

03/20/2014